

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION



Robert Taylor

Complaint for a Civil Case

Case No. _____

(to be filled in by the Clerk's Office)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

City of Three Rivers Michigan

Justin Holbrook

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

REQUEST FOR TRIAL BY JURY

Plaintiff requests trial by jury. ☒ Yes ☐ No

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Robert Taylor
Street Address	2546 W. Lincoln St.
City and County	Springfield, Greene
State and Zip Code	Missouri 65806
Telephone Number	269 503 5338
E-mail Address	rmt99975@yahoo.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	City of Three Rivers
Job or Title (if known)	
Street Address	333 W. Michigan Ave.
City and County	Three Rivers, St. Joseph
State and Zip Code	Michigan, 49093
Telephone Number	269 273 1075
E-mail Address (if known)	mbliss@threeriversmi.org

Defendant No. 2

Name	Justin Holbrook
Job or Title (if known)	Police officer
Street Address	56935 Tamarac Ln.
City and County	Three Rivers, St. Joseph

State and Zip Code Michigan, 49093

Telephone Number 269 273 1075

E-mail Address jholbrook@threeriversmi.org
(if known)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only three types of cases can be heard in federal court. Provide the designated information for this type of case. *(Check all that apply)*

☒ Federal question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

First, Fourth, and Fourteenth Amendments

Americans with Disability Act, 42 U.S.C. sec 12131-12134

Title 42, sec. 1983, 1985(2), and 1986

☐ Suit against the Federal Government, a federal official, or a federal agency

List the federal officials or federal agencies involved, if any.

☒ Diversity of Citizenship

These are cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

A. The Plaintiff(s)

The plaintiff, *(name)* Robert Taylor, is a citizen of the State of *(name)* Missouri.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

B. The Defendant(s)

1. If the defendant is an individual

The defendant, (name) Justin Holbrook, is a citizen of the State of (name) Michigan. Or is a citizen of (foreign nation) _____.

2. If the defendant is a corporation

The defendant, (name) City of Three Rivers, is incorporated under the laws of the State of (name) Michigan, and has its principal place of business in the State of (name) Michigan. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

C. The Amount in Controversy

The amount in controversy----the amount the plaintiff(s) claims the defendant(s) owes or the amount at stake---is more than \$75,000, not counting interest and costs of court, because *(explain)*:

it is an inchoate offense by the City of Three Rivers Michigan that caused loss of property

III. Statement of Claim

Write a short and plain statement of FACTS that support your claim. Do not make legal arguments. You must include the following information:

- What happened to you?
- What injuries did you suffer?
- Who was involved in what happened to you?

- How were the defendants involved in what happened to you?
- Where did the events you have described take place?
- When did the events you have described take place?

If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

1. Was stalked, surveilled, intimidated and searched because of disability.
2. Suffered physical and mental harm aggravated by loss of healthcare and debilitating disabilities.
3. The harm came from the City of Three Rivers Michigan, City of Three Rivers employee, Justin Holbrook, unknown Three Rivers law enforcement officers, and persons known to the City of Three Rivers, Brandon Dahl, John Overton, Don Overton, Michael Overton.
4. Retaliation for taking part in official proceedings and partaking in Michigan Medical Marihuana Program
5. In the City of Three Rivers
6. For a period of time from 10/06/2017- 11/09/2019

IV. Relief

State briefly and precisely what damages or other relief you want from the Court. Do not make legal arguments.

Respectful request court award (a) reasonable and appropriate compensatory damages, (b) Plaintiff's costs, expenses pursuant to 42 U.S.C. Sec 1988 and (c) such other relief as court deems necessary and proper.

Do you claim the wrongs alleged in your complaint are continuing to occur at the present time?

Yes ☐

No ☒

Do you claim actual damages for the acts alleged in your complaint?

Yes ☐

No ☒

Do you claim punitive monetary damages?

Yes ☒

No ☐

If you indicated that you claim actual damages or punitive monetary damages, state the amounts claimed and the reasons you claim you are entitled to recover these damages.

\$75,000 for loss of participation in federal loan program (USDA,FHA,)when because of disability, was intimidated
to a point safety was a concern, resulting in relocation, loss of familial and medical support.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: Jan 28, 2021.

Signature of Plaintiff

Printed Name of Plaintiff Robert Taylor


